ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of	)	
		DOCKET FILE COPY ORIGINAL
Amendment of Parts 2 and 25 to Implement the Global Mobile Personal Communications by Satellite (GMPCS) Memorandum of Understanding and Arrangements	)	IB Docket No. 99-67
Petition of the National Telecommunications and Information Administration to Amend Part 25 of the Commission's Rules to Establish Emissions Limits for Mobile and Portable Earth Stations Operating in the 1610-1660.5 MHz Band	)	RM No. 9165

RECEIVED

JUL 21 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS OF AMSC SUBSIDIARY CORPORATION

Bruce D. Jacobs
Stephen J. Berman
Fisher Wayland Cooper
Leader & Zaragoza L.L.P.
2001 Pennsylvania Ave., N.W.
Suite 400
Washington, D.C. 20006
(202) 659-3494

Lon C. Levin
Vice President and Regulatory Counsel
AMSC Subsidiary Corporation
10802 Park Ridge Boulevard
Reston, Virginia 20191
(703) 758-6000

July 21, 1999

No. of Copies rec'd 0+4
List A B C D E

Summary

AMSC Subsidiary Corporation ("AMSC") hereby replies to comments on the Commission's proposed domestic implementation of the Global Mobile Personal Communications by Satellite ("GMPCS") framework. AMSC recognizes that the ITU's GMPCS structures are designed to promote the operations of global and regional GMPCS operations, but it urges the Commission to account for AMSC's unique role as the domestic U.S. MSS L-band licensee as it implements this framework.

As an initial matter, the Commission should make clear that GMPCS implementation will not change its basic licensing processes, and that it will continue to require applicants for U.S. service to meet all applicable legal, technical, and public interest requirements. GMPCS implementation should not alter the *DISCO II* licensing framework, under which non-U.S.-licensed systems have to demonstrate, among other things, that there are spectrum and orbital resources available for their proposed U.S. operations.

Even with its new equipment certification procedure, the Commission should continue to apply its technical qualifications test to all blanket license applicants seeking to provide service in the U.S. If the Commission no longer applies this test in its blanket licensing process, foreign-licensed GMPCS operators may be able to gain access to the U.S. market without demonstrating their technical qualifications, since operators with GMPCS terminals sold or leased outside the U.S. will not be required to certify these terminals with the Commission. The Commission's technical requirements are particularly significant in the MSS L-band, where applicants are required to demonstrate that they can provide priority and preemptive access for maritime and aeronautical safety communications services.

As it has proposed, the Commission should exempt from its equipment certification requirement GMPCS terminals already operating over a U.S.-licensed system. With respect to

terminal circulation, while AMSC believes that the Commission should generally bar the entry into the U.S. of unmarked GMPCS terminals, the Commission should permit the entry of any unmarked GMPCS terminals operating now or in the future under a U.S. blanket license. In addition, to effectively implement these policies, AMSC believes that the Commission should account for the multiple categories of GMPCS terminal (*i.e.*, marked terminals that can be used in the U.S., marked terminals that are transit-only, unmarked terminals that can enter the U.S) in its GMPCS database.

AMSC continues to urge the Commission to extend the final compliance deadline for its out-of-band emissions standard to 2010, since no evidence has been presented that commercial aircraft will be able to use Glonass for navigation on precision approaches by 2005. At a minimum, the Commission should monitor Glonass' development and extend this deadline at the appropriate time. In addition, the Commission should reject any suggestion that its limits on out-of-band emissions from GMPCS terminals must also protect land and maritime uses of GPS. AMSC has been working with its mobile terminal manufacturers towards compliance with the standard proposed by NTIA and the Commission, and further adjustment would be unfair to AMSC and other GMPCS operators that have relied on these proposals.

Finally, AMSC reiterates that it is neither necessary nor appropriate at this time to revisit the Commission's 1996 decision exempting MSS operators from its E911 requirements. The very existence of AMSC's system has benefitted emergency communications in the U.S. by allowing service to formerly unserved rural and remote areas, and AMSC has allocated significant resources to the development of its Emergency Referral Service system. AMSC has relied on the Commission's 1996 decision, and a reversal of that policy would undercut the regulatory stability that GMPCS operators such as AMSC need as they move forward with their business plans.

Table of Contents

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of	)	
	)	
Amendment of Parts 2 and 25 to Implement the Global Mobile Personal Communications by Satellite (GMPCS) Memorandum of Understanding and Arrangements	)	IB Docket No. 99-67
	)	
Petition of the National Telecommunications and Information Administration to Amend Part 25 of the Commission's Rules to Establish Emissions Limits for Mobile and Portable Earth Stations Operating in the 1610-1660.5 MHz Band	)	RM No. 9165

REPLY COMMENTS OF AMSC SUBSIDIARY CORPORATION

AMSC Subsidiary Corporation ("AMSC") hereby replies to comments on the Commission's proposals in the above-captioned rulemaking on domestic implementation of the Global Mobile Personal Communications by Satellite ("GMPCS") framework. While AMSC recognizes that the ITU's GMPCS structures are designed to promote the operations of global and regional GMPCS operations, it urges the Commission to account for AMSC's unique role as the domestic U.S. MSS L-band licensee as it implements this framework. The Commission should make clear that GMPCS implementation will not change its basic licensing processes, and that it will continue to require applicants for U.S. service to meet all applicable legal, technical, and public interest requirements. The Commission should also recognize that certain proposals regarding the circulation of GMPCS terminals are inappropriate as applied to an existing U.S. licensee, such as AMSC, that provides domestic service only.

AMSC continues to urge the Commission to take the steps necessary to minimize the illegal use of unauthorized GMPCS terminals in the U.S., and it again asks the Commission to adopt a GMPCS out-of-band emissions standard that avoids unreasonable harm to existing MSS

operators. Finally, AMSC reiterates that it is neither necessary nor appropriate at this time to revisit the Commission's 1996 decision exempting MSS operators from its E911 requirements.

Background

On March 5, 1999, the Commission issued its Notice of Proposed Rulemaking ("*NPRM*") on domestic implementation of the International Telecommunication Union's ("ITU") GMPCS framework. On June 21, 1999, AMSC[1/] and approximately twenty other parties filed comments on the Commission's proposals.[2/] AMSC urged the Commission to make clear that domestic implementation of GMPCS will leave intact the legal, technical, financial, and public interest criteria applied in the Commission's blanket licensing processes, including blanket licensing under the *DISCO II* framework. AMSC Comments at 12-13. AMSC also asked that the Commission do more than it proposed in the *NPRM* to prevent the illegal domestic operation of ITU-marked but unauthorized GMPCS terminals, and it urged the Commission to modify its proposed schedule for application of limits on out-of-band emissions from GMPCS terminals and extend its final compliance deadline from 2005 until 2010. *Id.* at 13-15. Finally, AMSC pointed out that there is no legitimate reason at this time for the Commission to reconsider its 1996 decision to

---

1/ AMSC is a GMPCS system operator. AMSC is the entity authorized by the Commission in 1989 to construct, launch and operate the first U.S. MSS system in the upper L-band (1545-1559/1646.5-1660.5 MHz). AMSC has also received temporary authority to operate in the lower L-band (1530-1544/1631.5-1645.5 MHz), and the Commission has proposed to grant AMSC permanent authority in the lower L-band. *See* Order and Authorization, AMSC Subsidiary Corporation, 10 FCC Rcd 10458 (1995); Notice of Proposed Rulemaking, Establishing Rules and Policies for the Use of Spectrum for Mobile Satellite Service in the Upper and Lower L-band, IB Docket No. 96-132, 11 FCC Rcd 11675 (1996). The first AMSC satellite, AMSC-1, was launched in 1995, and AMSC began offering service in 1996, representing an investment of over $600 million. Today, AMSC offers a full range of land, maritime, and aeronautical mobile satellite services, including voice and data, throughout the contiguous United States, Alaska, Hawaii, the U.S. Virgin Islands, and coastal areas up to 200 miles offshore.

2/ Comments of AMSC Subsidiary Corporation (June 21, 1999) ("AMSC Comments").

exempt MSS providers from E911 requirements. *Id.* at 16-17.

In their comments, other parties also discuss these issues, and deal with a number of issues that AMSC did not address. AMSC responds to these comments below.

Discussion

I. Domestic Implementation of the GMPCS Framework

A. The Commission should make clear that spectrum availability and other blanket licensing criteria will remain applicable following domestic GMPCS implementation

In its Comments, Constellation Communications, Inc. ("Constellation") argues that the Commission's blanket licensing processes for equipment-certified GMPCS terminals should be "streamlined." Constellation says that the blanket license application process should be "*pro forma*," and that such applications should be "routinely" granted to any entity authorized by a GMPCS operator to resell service over its system.[3/]

The Commission should reject this view, which is inconsistent with the *NPRM* and sound licensing policy. Following GMPCS implementation, all applicants for authority to provide service in the United States, including those which have affixed the ITU mark on their terminals, should still have to meet all of the Commission's applicable legal, technical, and public interest requirements. In particular, under the *DISCO II* licensing framework,[4/] non-U.S.-licensed system should have to demonstrate that there are spectrum and orbital resources available for their

---

[3/] Comments of Constellation Communications, Inc. (June 21, 1999) ("Constellation Comments").

[4/] Report and Order, Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Service in the United States, 12 FCC Rcd 24094 (1997) (*"DISCO II Order"*).

proposed U.S. operations before they can be awarded a domestic blanket license.[5/] Satisfaction of these requirements is not "*pro forma*" or "routine."

It is particularly critical to AMSC that the final GMPCS order maintain the Commission's fundamental licensing policies. As indicated in AMSC's comments, TMI Communications and Company, L.P. ("TMI") and Comsat Corporation ("Comsat") are currently seeking to provide GMPCS in the U.S. market, despite the lack of available spectrum in the MSS L-band and their failure to satisfy the Commission's technical requirements. *See* AMSC Comments at 3-4. The Commission's order should make clear that such criteria will remain applicable, and that affixation of the ITU mark will not make grant of such blanket license applications "routine."

B. Following GMPCS implementation, the Commission should still require blanket license applicants to meet all applicable technical and operational requirements, including priority and preemptive access requirements in the MSS L-band

In the *NPRM*, the Commission asks if it should continue to apply a technical qualifications test in its blanket licensing process, given the technical showing required in the Commission's proposed equipment certification procedure. *NPRM* at para. 31. In response, several potential GMPCS operators argue that the Commission should address technical issues only in the equipment certification process, and should no longer require blanket license applicants to demonstrate compliance with applicable technical requirements.[6/]

5/ *See DISCO II Order* at para. 147; Notice of Proposed Rulemaking, Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Service in the United States, 11 FCC Rcd 18178, para. 50 (1996).

6/ Constellation Comments at 10; Joint Comments of L/Q Licensee, Inc., Globalstar, L.P. and Airtouch Satellite Services U.S., Inc., at 11 (June 21, 1999) ("Globalstar Comments"); Comments of ICO Global Communications, at 5 (June 21, 1999) ("ICO Comments"); Comments of Orbital Communications Corporation, at 8-9 (June 21, 1999) ("OrbComm Comments").

The Commission should reject this suggestion, and should continue to apply its technical qualifications test to all blanket license applicants seeking to provide service in the U.S. If the Commission no longer applies this test in its blanket licensing process, foreign-licensed GMPCS operators may gain access to the U.S. market without demonstrating their technical qualifications, since operators with GMPCS terminals sold or leased outside the U.S. will not be required to certify these terminals with the Commission. This outcome would be inconsistent with the Commission's *DISCO II* policy, which established that non-U.S. satellite operators must comply with the Commission's technical requirements before they can receive authority to provide service in the U.S. *DISCO II Order* at para. 156. Absent this requirement, said the Commission in *DISCO II*, the operations of foreign-licensed systems might cause unacceptable interference to U.S. systems and disrupt service to customers. *Id.*

The Commission's technical requirements are particularly significant in the MSS L-band, where applicants are required to demonstrate that they can provide priority and preemptive access for maritime and aeronautical safety communications services. Neither TMI nor Comsat, both of which seek access to L-band spectrum to serve the U.S., have shown that they can provide priority and preemptive access in compliance with the Commission's rules.[7/]

C. The Commission should exempt GMPCS terminals already operating over a U.S.-licensed GMPCS system from its equipment certification requirement

In the *NPRM*, the Commission proposes to exempt GMPCS terminals already operating over a U.S.-licensed system from its proposed requirement for equipment certification. (Under the Commission's proposal, only GMPCS terminals that are sold or leased for operation in the

---

7/ *See, e.g.*, Petition to Deny, AMSC Subsidiary Corporation, FCC File No. 1281-DSE-P/L-96, at 4-5 (July 12, 1996); AMSC Petition to Deny Application of TMI Communications and Company, L.P., FCC File No. 730-DSE-P/L-98, at 11-16 (May 29, 1998).

U.S. are subject to this certification requirement.) AMSC agrees with several commenters that the Commission should adopt this proposal and grandfather these GMPCS terminals.[8/] Terminals already operating under an existing U.S. blanket license present no risk of harmful emissions, and certification of already-operating terminals would place an unnecessary burden on affected GMPCS operators.

D. The Commission should prohibit the entry into the U.S. of GMPCS terminals not bearing the ITU mark, except for terminals operating under a U.S. blanket license

In its comments, Inmarsat Ltd. ("Inmarsat") objects to the Commission's proposal to prohibit the entry into the U.S. of GMPCS terminals not bearing the ITU mark. Inmarsat Comments at 3. Inmarsat believes that an unmarked GMPCS terminal carried only as a personal effect should be permitted entry. *Id.*

The Commission should reject Inmarsat's view, and should generally bar the entry of unmarked GMPCS terminals. AMSC agrees with the Commission that this policy will help to trace illegally-operated GMPCS terminals to specific foreign GMPCS operators and protect existing networks against potential interference. *NPRM* at para. 27. If the Commission instead as a general matter permits unmarked GMPCS terminals to enter the U.S., such illegal operations and resulting interference problems will be more difficult to prevent.

Not all GMPCS terminals, however, should be subject to this "no mark, no entry" policy. In its comments, Constellation argues that the Commission should permit the entry into the U.S. of any unmarked GMPCS terminal operating now or in the future under a U.S. blanket license,

---

8/ *See* Comments of Comsat Corporation, at 4 (June 21, 1999) ("Comsat Comments"); Comments of Inmarsat Ltd., at 2 (June 21, 1999) ("Inmarsat Comments"); OrbComm Comments at 5.

and AMSC agrees with this view.[9/] It would be illogical for domestic customs officials to bar the entry of GMPCS terminals that the Commission has licensed to operate in the U.S.

At a minimum, the Commission should clarify that any GMPCS terminals exempted from its equipment certification requirements can enter the U.S. without bearing the ITU mark. A contrary decision that precludes the reentry into the U.S. of AMSC's existing terminals would be unreasonable and inconsistent with the Commission's proposed certification exemption.[10/]

E. The Commission should maintain a database that distinguishes between different categories of GMPCS terminal

In its comments, Globalstar argues that the Commission should avoid maintaining "multiple lists of approved and not approved [GMPCS] terminals." Globalstar Comments at 8-9. AMSC disagrees with Globalstar and believes that the Commission should take account of these multiple categories in its GMPCS-terminal database, which is to be shared with the U.S. Customs Service. Both the Commission and Customs should know which marked GMPCS terminals can be operated in the U.S., which marked terminals can only be transported into the U.S., and which unmarked GMPCS terminals can enter the U.S. The maintenance of a detailed database does not appear to be a significant administrative burden, and such records will assist in the effective implementation and enforcement of the domestic GMPCS framework.

9/ Constellation Comments at 8.

10/ Comsat and Inmarsat contend that their existing, unmarked GMPCS terminals, including land-base terminals, should be permitted to enter the United States, despite the fact that neither has obtained a blanket license to provide GMPCS in the United States. In support, Comsat and Inmarsat point to the fact that certain of their terminal types have previously been type approved in the U.S. and elsewhere. Comsat Comments at 4-7; Inmarsat Comments at 2-4. The Commission should reject this view, and should only permit the entry of their existing terminals (and the existing terminals of any other foreign-licensed GMPCS operator) if (i) they gain the right, pursuant to the GMPCS Arrangements, to place the ITU mark on terminals of that type, or (ii) they obtain a blanket license for the operation of these GMPCS terminals in the U.S. .

F. A GMPCS operator should not escape liability for the provision of unauthorized U.S. service because of an inability to determine the location of terminals operating over its network

In its comments, Comsat suggests that there may be circumstances in which a GMPCS service provider cannot reasonably be held accountable for customers' violations of the Commission's rules. Explaining this view, Comsat indicates that it cannot determine the location of GMPCS terminals operated over its system and has no control over where its customers use their terminals. Comsat Comments at 10.

The Commission should dismiss this suggestion. A GMPCS provider's technical inability to determine the location of its terminals does not justify less stringent enforcement of the Commission's prohibition on unauthorized U.S. service. As proposed in the *NPRM*, the Commission should confiscate any GMPCS equipment operated illegally in the U.S., and, where the GMPCS provider in question is otherwise subject to the Commission's jurisdiction (as is Comsat), the Commission should impose appropriate liability on that provider.[11/]

II. Out-of-band Emissions Limits for GMPCS Terminals

A. The Commission should extend its deadline for the retirement or retrofitting of non-compliant GMPCS terminals

In its comments, the National Telecommunication and Information Administration ("NTIA") asserts that Glonass should receive as much protection from harmful interference as

---

11/ As indicated in its comments, AMSC believes that GMPCS system operators without the technical ability to block calls to and from the U.S. should be obligated to impose some non-technical restriction on such domestic use, such as a prohibition on such calls in customers' service contracts, with termination of service to customers violating this provision. AMSC Comments at 13-14. Where there is evidence that a GMPCS provider's terminals are being used illegally in the United States, the Commission should block the entry of its terminals until the operator can demonstrate that it can prevent such use.

GPS.[12/] At the same time, NTIA recognizes that it is uncertain whether Glonass will be used domestically for navigation on precision approaches by 2005, and it recommends that the final deadline for compliance with the Commission's proposed out-of-band emissions limits be extended if appropriate. NTIA Comments at 23-24. In contrast, Aeronautical Radio, Inc. ("ARINC") urges the Commission to apply its proposed 2005 deadline.[13/] It claims, without citing specific evidence, that the International Civil Aviation Organization is working to incorporate Glonass into the GNSS, and that Glonass should be fully protected given that non-U.S. aircraft operating in U.S. airspace may rely on this system as their exclusive means of aeronautical navigation. ARINC Comments at 5. Finally, while Globalstar recognizes that the use of Glonass on precision approaches may be delayed significantly, it argues that the Commission should stick to its proposed 2005 deadline, given the benefits of regulatory certainty and finality. Globalstar Comments at 24.

The Commission should reject the arguments of ARINC and Globalstar and extend the final compliance deadline for its out-of-band emissions standard to 2010. None of the commenters present any evidence to refute the showing by AMSC and others that commercial aircraft will in all likelihood be unable to use Glonass for navigation on precision approaches until well after 2005. As AMSC discussed in its comments, the integration of Glonass into a U.S. domestic GNSS is highly speculative and has no specific schedule, and no substantial and unnecessary burdens should be imposed on AMSC in order to protect Glonass from

---

12/ Comments of the National Telecommunications and Information Administration, at 9, 23-24 (June 21, 1999) ("NTIA Comments").

13/ Comments of Aeronautical Radio, Inc., at 5 (June 21, 1999) ("ARINC Comments").

interference.[14/] In particular, it is telling that NTIA, which first proposed the 2005 deadline, has conceded that Glonass implementation is uncertain. At a minimum, the Commission should follow NTIA's recommendation, monitoring Glonass' development and extending this deadline if appropriate.

B. The Commission's out-of-band emission standard for GMPCS terminals should only protect aeronautical uses of GNSS

The U.S. GPS Industry Council ("GPS Council") and LSC, Inc. ("LSC") argue that the Commission must act to protect the operation of GPS receivers not only in aeronautical settings, but also in land and marine environments.[15/] According to GPS Council and LSC, the Commission's proposed implementation of limits on out-of-band emissions from GMPCS terminals will not safeguard these land and marine applications; specifically, GPS Council argues that the Commission should not grandfather any existing GMPCS terminals, while LSC asserts that the Commission's final emissions standard should be more stringent. GPS Council Comments at 21-23; LSC Comments at 31.

The Commission should reject these arguments. As the Commission itself indicates in the *NPRM*, the purpose of its proposed emissions limits is strictly to protect aeronautical uses of GPS and Glonass. *NPRM* at para. 77. Moreover, the GPS industry has been aware for years of the

---

14/ As AMSC indicated in its comments, application of the Commission's proposed 2005 deadline would impose on AMSC a liability of $60-80 million to replace non-compliant terminals that remain in use at the end of 2004, which is little more than five years away and well before the end of the terminals' likely operational life. AMSC Comments at 9-10, 14-15. If the Commission forces AMSC to absorb such an enormous and unnecessary liability, AMSC continues to believe that it would be appropriate to require GNSS users to compensate it for these costs

15/ *See* Comments of the U.S. GPS Industry Council (June 21, 1999) ("GPS Council Comments"); LSC Comments on Protection for GPS/GLONASS Radionavigation Systems (May 2, 1999) ("LSC Comments").

development of existing and proposed out-of-band emissions limits for GMPCS terminals, and the burden should be on them to produce receivers that are resistant to GMPCS emissions. The GMPCS systems that would be affected by the proposals of these commenters have already been developed, deployed, and either are already in service, like AMSC, or will soon begin to offer service. It is not fair to these GMPCS operators to perpetually reassess the necessary limits on MSS emissions with the arrival of each successive GPS marketing plan. AMSC has been working with its mobile terminal manufacturers towards compliance with the NTIA-proposed standard, and further adjustment would be unfair to AMSC and other GMPCS operators that have made the reasonable decision to incorporate this standard into their mobile terminal design.

III. Enhanced 911 Requirements: The Commission Should Not Impose E911 Requirements on GMPCS Operators

In response to the Commission's inquiry in the *NPRM*, several commenters support the imposition of E911 requirements on GMPCS operators.[16/]

The Commission granted AMSC and other MSS providers an exemption to its E911 rules less than three years ago, and, while the Commission did not rule out applying such requirements in the future, there is no basis at this time for eliminating or narrowing this exemption. The very operation of AMSC's system has added greatly to emergency communication capabilities in the U.S., providing service to vast areas that were previously unserved by any communications facilities. In addition, as described in its comments, AMSC has allocated significant resources to the development of its Emergency Referral Service ("ERS") system. AMSC Comments at 5. In

---

16/ *See* Comments of the United States Coast Guard ("USCG") (June 21, 1999); Comments of the National Search and Rescue Committee ("NSRC") (June 21, 1999); Comments of the Association of Public-Safety Communications Officials-International, Inc. ("APCO") (June 21, 1999); Comments of the National Emergency Number Association (June 21, 1999).

order to provide ERS, AMSC has a group of professionally trained emergency operators on call at all times at its Reston headquarters. These operators request the caller's location and phone number and conference the caller in with the appropriate emergency contact, who is also supplied with this key information. *Id.* In operating its ERS system, AMSC has relied on the Commission's 1996 order, and a reversal of this sound decision just three years later would undercut the regulatory stability that GMPCS operators such as AMSC need as they move forward with their business plans.

In arguing that AMSC and other GMPCS providers should be required to provide E911 services, commenters make erroneous assumptions about the technical capabilities of AMSC's geostationary MSS system.[17/] As AMSC indicated in its comments, it cannot comply with a certain number of the Commission's E911 requirements, including Automatic Location Information ("ALI") and automatic number identification ("ANI").[18/]

Finally, AMSC agrees with several commenters that the instant rulemaking is not the appropriate forum for reconsideration of the Commission's 1996 E911 exemption for MSS providers. If the Commission is intent on reexamining the technical feasibility of E911 in the GMPCS context, rather than bootstrap this issue onto the current proceeding, the Commission should conduct a separate rulemaking.

17/ NENA states that the "nature and design of satellite signals provides coordinate information," while APCO claims that "there would appear to be no technical reason not to require E911 capability from the outset." NENA Comments at 2; APCO Comments at 3. NSRC states that ALI "should consist of location information which is already inherent in MSS systems . . ." NSRC Comments at 3.

18/ In its comments, USCG proposes that the Commission require GMPCS operators lacking E911 capability to place disclaimers on their terminals. USCG Comments at 11. Such a requirement does not appear appropriate at this time, since there is and should be no expectation by potential users that GMPCS terminals will provide E911 capability.

Conclusion

Therefore, based on the foregoing, AMSC urges the Commission to act in a manner consistent with the views expressed in these Reply Comments.

Respectfully submitted,

AMSC SUBSIDIARY CORPORATION

Bruce D. Jacobs
Stephen J. Berman
Fisher Wayland Cooper
Leader & Zaragoza L.L.P.
2001 Pennsylvania Ave., N.W.
Suite 400
Washington, D.C. 20006
(202) 659-3494

July 21, 1999

Lon C. Levin
Vice President and Regulatory Counsel
AMSC Subsidiary Corporation
10802 Park Ridge Boulevard
Reston, Virginia 20191
(703) 758-6000

CERTIFICATE OF SERVICE

I, Cindi Smith Rush, do hereby certify that I have on this 21st day of July, 1999, caused copies of the foregoing **"REPLY COMMENTS OF AMSC SUBSIDIARY CORPORATION"** to be sent via first-class United States mail, postage prepaid to the following:

Logan Scott, Principal
LSC, Inc.
P.O. Box 4734
Breckenridge, CO 80424

Tom W. Davidson, Esq.
Phil Marchesiello, Esq.
Akin, Gump, Strauss, Hauer & Feld, LLP
1333 New Hampshire Avenue, N.W.
Suite 400
Washington, D.C. 20036

Cheryl A. Tritt, Esq.
James A. Casey, Esq.
Morrison & Foerster, LLP
2000 Pennsylvania, N.W.
Suite 5500
Washington, D.C. 20006

Francis D.R. Coleman
Gregory Francis
ICO Global Communications
1101 Connecticut Avenue, N.W.
Suite 550
Washington, DC 20036

Joseph D. Hersey, Jr.
Chief, Spectrum Management Division
Commandant (G-SCT-2)
United States Coast Guard
Washington, DC 20593-0001

Stephen P. Carrier
Vice President and General Counsel
Hughes Network Systems
11717 Exploration Lane
Germantown, MD 20876

John L. Bartlett, Esq.
T. Eric Lai, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington D.C. 20006-2304

Bruce Alberts, President
National Academies'
Committee on Radio Frequencies
2101 Constitution Ave, N.W.
Washington D.C. 20418

Joseph P. Markoski, Esq.
Herbert E. Marks, Esq.
David A. Nall, Esq.
Bruce A. Olcott, Esq.
Benigno E. Bartolome, Esq.
Squire, Sanders & Dempsey, LLP
1201 Pennsylvania Ave., NW
P.O. Box 407
Washington, DC 20044-0407

Craig Holman
Office of the Group Counsel
Space & Communications Group
The Boeing Company
P.O. Box 3999, M/S 84-10
Seattle, WA 98124-2499

Dan Lemon
Secretary,
National Search and Rescue Committee
2100 2nd Street, SW, Suite 3106
Washington, DC 20593-0001

Laura A. LoBianco
Senior Attorney
Iridium North America
8440 S. River Parkway
Tempe, AZ 85284

Linda C. Sadler
Brett Wilson
Rockwell Collins, Inc.
1300 Wilson Blvd.
Arlington, VA 22209

Paul R. Rodriguez, Esq.
Stephen D. Baruch, Esq.
Leventhal, Senter & Lerman, PLLC
2000 K Street, N.W.
Suite 600
Washington, DC 20006

Robert A. Mansbach, Esq.
COMSAT Corporation
6560 Rock Spring Drive
Bethesda, MD 20817

Stephen L. Goodman, Esq.
Halprin, Temple, Goodman & Maher
555 12th Street, N.W., Suite 950 North
Washington, DC 20004

Robert A. Mazer, Esq.
Albert Shuldiner, Esq.
Counsel Vinson & Elkins, LLP
1455 Pennsylvania Ave, N.W.
Washington, D.C. 20004-1008

Kathy Smith
Acting Chief Counsel
National Telecommunications and
Information Administration
U.S. Department of Commerce
Room 4713
1401 Constitution Ave, N.W.
Washington, DC 20230

Phillip L. Spector, Esq.
Laura B. Sherman, Esq.
Kira A. Merski, Esq.
Paul, Weiss, Rifkind, Wharton & Garrison
1615 L Street, N.W., Suite 1300
Washington, DC 20036

Kelly Cameron, Esq.
Robert L. Galbreath, Esq.
Powell, Goldstein, Fraser & Murpy LLP
1001 Pennsylvania Ave, N.W.
Sixth Floor
Washington, DC 20004

Paul J. Feldman, Esq.
Fletcher, Heald & Hildreth, PLC
1300 North 17th Street
11th Floor
Arlington, VA 22209

Cindi Smith Rush
Cindi Smith Rush

J:\DATA\CLIENT\TRANSFER\CERTSCH.WPD